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From: Hurwitz, Evelyn S On Behalf Of Public Info
Sent: Monday, August 14, 2000 10:29 AM
To: Gottlieb, Mary H
Subject: FW: March 2001 changes

-----Original Message-----

From: tloughmiller@intrieve.com [mailto:tloughmiller@intrieve.com]
Sent: Friday, August 11, 2000 3:06 PM
To: public.info@ots.treas.gov
Subject: March 2001 changes

The following are comments/questions regarding the proposed March 31,2001 TFR changes.

I work for a financial industry data servicer, Intrieve, Inc in Cincinnati, Ohio and am responsible for the system programming for producing the FDIC Call reports and the OTS TFR Call reporting.

My name is Terry Loughmiller, AVP Technical Development, phone: 513-381-9475, email: tloughmiller@intrieve.com.

My questions and comments are relevant to the "subprime loan" reporting. I have been studying the new proposed reporting changes for the FDIC reporting for "subprime loans" when I just learned today that the OTS TFR reports are going to require the exact same information to be reported. My concern is how to get this information stored on our Mortgage loan account record so the loans can easily be identified. We currently have several data fields that allow for "Asset Classification" for totals that are reported on the Schedule VA for "Special Mention,Doubtful, Substandard, or Loss" categories. I was looking at this "Subprime" category as another label for Asset Classification and was hoping to be able to use the SAME account record data fields.

As I study the proposed changes, it seems that a "Subprime loan" could later become "Substandard or Doubtful". If this is true, do we still need to know if this account was a "Subprime" loan once it becomes classified into another asset classification category ?? Is there any correlation

between the totals we currently provide on Schedule VA
and the new Subprime totals we will be reporting on Schedule NL ?? I
am concerned that by using the same field,
I could be producing incomplete reports where a loan may need to be
reported as both Subprime and as Doubtful.

Further interpretation of this ruling change and consideration of the
various Asset Classification categories would be
greatly appreciated.

Sincerely

Terry Loughmiller *****

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